

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE EXSCIENTIA P.L.C.  
SECURITIES LITIGATION

This Document Relates To: All Actions

Master File No. 1:24-cv-05692-  
RMB-AMD

CLASS ACTION

Filed Electronically

Motion Day: May 19, 2025  
Judge: Hon. Renée Marie Bumb  
Courtroom: 3D

ORAL ARGUMENT REQUESTED

**DEFENDANTS’ NOTICE OF MOTION AND  
MOTION TO DISMISS THE AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that on May 19, 2025, or on such date and at a time designated by the Court, Defendants Exscientia p.l.c. (“Exscientia”), Andrew Hopkins, and David Nicholson (collectively, “Defendants”), by and through undersigned counsel, will and hereby do move this Court before the Honorable Renée Marie Bumb, at the Mitchell H. Cohen Building & U.S. Courthouse for the District of New Jersey, located at 4<sup>th</sup> & Cooper Streets, Camden, New Jersey 08101, for an order dismissing with prejudice Plaintiffs’ Amended Class Action Complaint and each claim asserted therein pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u, et seq. (“PSLRA”).

This motion is based on this Notice of Motion and Motion, Defendants' Memorandum of Points and Authorities in Support of Defendants' Motion to Dismiss Plaintiffs' Amended Class Action Complaint, the Declaration of Elizabeth M. Wright in Support of Defendants' Motion and accompanying exhibits, all filed concurrently herewith, and all records and papers on file in this action, any oral argument, and any other evidence that the Court may consider in hearing this motion.

Defendants respectfully request oral argument on this Motion.

Dated: January 21, 2025

Respectfully submitted,

By: /s/ Sarah A. Sullivan  
**SAUL EWING LLP**  
Sarah A. Sullivan  
Alexander L. Callo  
One Riverfront Plaza  
1037 Raymond Blvd., Suite 1520  
Newark, NJ 01702-5426  
Telephone: (973) 286-6700  
Facsimile: (973) 286-6800  
sarah.sullivan@saul.com

**COOLEY LLP**  
Brian M. French (*pro hac vice* pending)  
Sarah M. Lightdale (*pro hac vice* pending)  
55 Hudson Yards  
New York, NY 10001-2157  
Telephone: (212) 479-6000  
Facsimile: (212) 479-6275  
bfrench@cooley.com  
slightdale@cooley.com

Elizabeth M. Wright (*pro hac vice*  
pending)  
500 Boylston Street, 14th Floor  
Boston, MA 02116  
Telephone: (617) 937-2300  
Facsimile: (617) 937-2400  
ewright@cooley.com

*Attorneys for Defendants*